

Den Hollander Reply
Ex. B

ROY DEN HOLLANDER
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February 10, 2009

Judge Frederick Block
Senior United States District Judge
United States Courthouse
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Den Hollander v. Donovan, et al., No. 08 CV 4045 (FB)(CLP)

Dear Judge Block:

On Friday, February 6th at the pre-motion conference, defendant Steinberg admitted that he was the one who initially reproduced the six essays, and that he gave them to defendant Swindells-Donovan.

As such, I am withdrawing the following paragraphs of the Complaint as they pertain to defendant Swindells-Donovan: ¶¶ 6, 17, 25 and ¶ 28 now only applies to one essay "A Different Time."

Thank you for your time.

Sincerely,

/S/

Roy Den Hollander (1957)

CC: Diane Krebs, Esq.
Gordon & Rees LLP
90 Broad Street, 23rd Floor
New York, N.Y. 10004
(212) 269-5500

Paul W. Steinberg, Esq.
14 East Fourth Street, Suite 408
New York, N.Y. 10012
(212) 529-5400

Den Hollander Reply
Ex. C



Roy Den Hollander <roy17den@gmail.com>

Hollander v. Copacabana

Deborah Swindells Donovan <DDonovan@gordonrees.com>
To: Roy Den Hollander <roy17den@gmail.com>

Wed, Oct 24, 2007 at 5:15 PM

Roy,

You are entitled to take any action you deem appropriate. However, I did not obtain those articles by "hacking." If you read my declaration carefully, you will see that I stated only that it was my understanding that the "articles" had been published on the internet. The articles were given to me by a third party.

I notice you are not denying that you wrote the offensive articles or that they appeared on the internet at one time

I am not the least bit concerned with your retaliatory action. Nor will it intimidate or prevent me from representing my client to the best of my ability.

Deborah



From: Roy Den Hollander [mailto:roy17den@gmail.com]
Sent: Wednesday, October 24, 2007 6:08 PM
To: Deborah Swindells Donovan
Subject: Hollander v. Copacabana

[Quoted text hidden]

San Francisco * San Diego * Los Angeles * Sacramento * Orange County * Las Vegas * Portland * Houston *
Phoenix * Dallas * New York * Long Island * Newark * Denver

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GORDON & REES LLP
<http://www.gordonrees.com>



Roy Den Hollander <roy17den@gmail.com>

Hollander v. Copacabana

Roy Den Hollander <roy17den@gmail.com>

Wed, Oct 24, 2007 at 5:39 PM

To: Deborah Swindells Donovan <DDonovan@gordonrees.com>

Dear Deborah,

So who's the alleged third party?

[Quoted text hidden]



Roy Den Hollander <roy17den@gmail.com>

Hollander v. Copacabana

Deborah Swindells Donovan <DDonovan@gordonrees.com>**Wed, Oct 24, 2007 at 5:40 PM**

To: Roy Den Hollander <roy17den@gmail.com>

I'm sure the investigators will find out if and when they investigate. I'm not going to offer up someone else for you to persecute..

From: Roy Den Hollander [mailto:roy17den@gmail.com]**Sent:** Wednesday, October 24, 2007 6:39 PM

[Quoted text hidden]

[Quoted text hidden]

Den Hollander Reply
Ex. D

ROY DEN HOLLANDER
Attorney at Law

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February 6, 2009

Judge Frederick Block
Senior United States District Judge
United States Courthouse
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Den Hollander v. Donovan, et al., No. 08 CV 4045 (FB)(ECF)

Dear Senior Judge Block:

At a pre-motion conference on February 6th in the above captioned copyright infringement case, you asked me a deposition question as to whether I published the six essays at issue in the case. I answered in error as a layman would and said "yes." The correct answer under 17 U.S.C. § 101 of the Copyright Act is "no." The essays were only temporarily "displayed"—not published.

Your clerk stated the conference was off the record, but counsel for the defendants noted my mistaken answer and will likely use it in her motion to dismiss papers.

Thank you for your time.

Sincerely,

/S/
Roy Den Hollander (1957)

CC: Diane Krebs, Esq.
Gordon & Rees LLP
90 Broad Street, 23rd Floor
New York, N.Y. 10004
(212) 269-5500